

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FRANCES PIERRE,

Plaintiff,

v.

J.P. MORGAN CHASE BANK,

Defendant.

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05 Civ. 1297 (GBD)

**NOTICE OF MOTION
FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that upon the annexed Statement of Material Facts pursuant to Local Civil Rule 56.1, the annexed affidavits of Tara A. Griffin, Esq., sworn to on September 21, 2007 (and the exhibits thereto), Brian Evers, sworn to on September 19, 2007 (and the exhibits thereto), Catherine Garcia, sworn to on September 20, 2007 (and the exhibits thereto) and Jeffrey Galiani, sworn to on September 20, 2007 (and the exhibits thereto), JPMorgan Chase Bank, National Association ("JPMC"), erroneously named herein as J.P. Morgan Chase Bank, will move this Court before the Honorable George B. Daniels, at the United States Courthouse, 500 Pearl Street, New York, New York for an order: (i) dismissing the Complaint of Plaintiff Frances Pierre in its entirety pursuant to Fed. R. Civ. P. 56; and, (ii) such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to the Court's Memorandum Order dated August 29, 2007 Plaintiff must serve Defendant with answering papers, if any, no later than November 5, 2007 and Defendant must serve Plaintiff with reply papers, if any, no later than December 5, 2007 or such other date as the Court shall deem appropriate.

Dated: New York, New York
September 21, 2007

JPMORGAN CHASE LEGAL DEPARTMENT

By: 
Tara A. Griffin, Esq.

Attorneys for Defendant

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